

1 MARK ABBEY SLOTKIN IN PRO PER  
7111 Santa Monica Blvd. SUITE B  
2 West Hollywood, California 90046-3458  
PO Box 401

3 Debtor in pro per  
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9 **UNITED STATES BANKRUPTCY COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

11 In Re:  
12 MARK ABBEY SLOTKIN,  
13 Debtor.

BANKRUPTCY COURT CASE NUMBER:  
2:20-bk-12042

ADVERSARY CASE NUMBER:  
2:20-ap-01672

CHAPTER: 7

14  
15 ELISSA D. MILLER, CHAPTER 7  
16 TRUSTEE,  
Plaintiff,

**MOTION TO RECUSE JUDGE SHERI  
BLUEBOND FOR CONFLICT OF  
INTEREST.**

17 vs.

Hearing Date:  
Time:  
Ctrm: 1539

18 SLOTKIN DEFECTIVE TRUST OF  
19 DECEMBER 14, 2012; SLOTKIN  
20 DEFECTIVE TRUST OF APRIL 12, 2010;  
21 INTENTIONALLY DEFECTIVE SLOTKIN  
FAMILY CHILDREN'S TRUST DATED  
JANUARY 1, 1997 ET AL.

22 Defendants.  
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1 **MOTION TO RECUSE JUDGE SHERI BLUEBOND FOR CONFLICT OF INTEREST.**

2 **PATTERN OF NON-DISCLOSURE**

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- 4 1. On March 3, 2022, Judge Sheri Bluebond participated in a Crossfire TV panel entitled
- 5 Bankruptcy Battleground put on by the US Bankruptcy Institution.
- 6 2. She was invited to participate by its chair, Robyn Sokol of Leech Tishman. Ms. Sokol is the
- 7 Trustee’s attorney in my Chapter 7 bankruptcy case.
- 8 3. Judge Sheri Bluebond DID NOT disclose this conflict of interest.
- 9 4. Judge Sheri Bluebond DID NOT disclose her association with Robyn Sokol.
- 10 5. Judge Sheri Bluebond DID NOT recuse herself from my case which she should have done at
- 11 the very beginning of the case.
- 12 6. It is obvious that she has a long-standing friendly relationship with Robyn Sokol of Leech
- 13 Tishman.
- 14 7. Judge Sheri Bluebond has an outside of court link with Trustee’s attorney, Robyn Sokol. It
- 15 was not by accident that Judge Sheri Bluebond was invited to sit on this televised panel
- 16 discussion.
- 17 8. They have been friends for a long time before March 3, 2022, the day of the TV show.
- 18 9. Judge Sheri Bluebond was the sitting judge on J.T. THORPE & THORPE INSULATION V.
- 19 **MANDELBROT Case 2:12-ap-02182 BB & Case 02-14216-BB in 2013**
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- 21
- 22 10. J.T. THORPE & THORPE INSULATION were represented by Stutman, Treister, and Glatt
- 23 (hereinafter Stutman) since 2006.
- 24 11. Judge Bluebond had a close relationship with Stutman and its lawyers for many years.
- 25 12. Mandelbrot was **never** notified nor did Judge Bluebond **disclose** the Stutman relationship
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1 13. Judge Bluebond did **not disclose** that Stutman was campaigning for her re-appointment  
2 during the trial.

3 14. Judge Bluebond served simultaneously on the Boards of Directors with Stutman of the  
4 following organizations.

5 a. FINANCIAL LAWYERS CONFERENCE 2013:

6 i. Judge Bluebond was the keynote guest speaker at a fundraising event hosted  
7 by Stutman.

8 b. LOS ANGELES BANKRUPTCY FORUM:

9 i. Sponsored by Stutman actively solicited favorable comments from its  
10 members for reappointment of Judge Bluebond to her judicial position.

11 c. TURNAROUND MANAGEMENT ASSOCIATION:

12 i. Judge Bluebond and Stutman served as Board members

13 d. AMERICAN BANKRUPTCY INSTITUTE:

14 i. Judge Bluebond was the guest speaker at the fundraising Winter leadership  
15 conference with many Stutman lawyers present.

16 15. The connection and friendship Judge Bluebond and Eva Karasik (Stutman lawyer) and the  
17 Stutman firm goes back decades. Same organizations, local boards, colleagues, and business  
18 circles.

19 16. When asked about these connections and their potential conflict of interests, Judge Bluebond  
20 was well aware of them, but NEVER disclosed them to the parties.

21 17. Judge Bluebond admitted in open court that she profited from these relationships and had a  
22 favoritism toward Stutman.

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26 **MISCONDUCT**

27 1. Judge Bluebond uses her office to:  
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- 1 a. Give favorable rulings to her friends (Stutman and Robyn Sokol)
- 2 b. Accepting personal favors from Stutman and Robyn Sokol (Sokol invited her to be a
- 3 panelist on Crossfire TV show).
- 4 c. Engaged in denigrating Debtor by labeling him a perjurer in some of her Court orders
- 5 without any proof whatsoever.
- 6 d. Disregarded undisputed proof of purge of contempt backed by hard evidence.
- 7 e. Told Debtor the Court saw furniture in a Zoom video in one of the hearings but
- 8 refused to supply the evidence, stating that it was up to me to tell the Court what I
- 9 was secreting.
- 10 f. Held an open arrest warrant for 6 months against debtor for a trumped-up contempt of
- 11 court written by Robyn Sokol and Trustee Elissa Miller.
- 12
- 13 i. Refused to accept unrefuted evidence of purge by Debtor and continued arrest
- 14 warrant with questions that would not yield any benefit to the Estate.
- 15 ii. Debtor submitted nine declarations answering each and every question put
- 16 forth by Judge Bluebond who most likely originated most of the mind-
- 17 numbing ridiculous non-relevant questions so that the arrest warrant would
- 18 not be recalled.
- 19
- 20 g. Violating Judicial Cannons by not observing the following:
- 21
- 22 i. Upholding the integrity and independence of the judiciary.
- 23 ii. By not avoiding impropriety and the appearance of impropriety in all the
- 24 judge's activities.
- 25 iii. By performing the duties of judicial office impartially, competently, and
- 26 diligently.
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- 1                   iv. By not conducting her quasi-judicial and extrajudicial activities as to  
2                   minimize the risk of conflict with judicial obligations.
- 3                   v. A judge or candidate for judicial office shall not engage in political campaign  
4                   activity
- 5                   vi. Simultaneously serving as judge in Debtor’s case and participation with an  
6                   invitation from Chair Robin Sokol in a nationally televised Crossfire TV panel  
7                   show creating a serious conflict of interest while not disclosing in open court  
8                   this conflict of interest.
- 9                   vii. Failing to avoid impropriety and the appearance of same by not disclosing her  
10                  longstanding relationship with Robyn Sokol.

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12 **ARREST WARRANT**

13                   1. A contempt hearing was held on April 12, 2022 where the Trustee alleged that Debtor  
14 (me) secreted assets. The evidence was 5 year old pictures of antiques that were in a residence that  
15 the Trustee took over after eviction on March 10, 2022.

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17                   2. I provided sales invoices for each and every antique (I was in the business before they sold  
18 all of its assets. That wasn’t good enough for Judge Bluebond.

19                   3. She claimed they has Zoom video from our Court hearings that showed additional  
20 furniture, but when asked to produce the evidence, she said it was up to me to tell them what was in  
21 the house. The Court never produced the Zoom video.

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23                   4. I purged each contempt charge and for the last 5 10-page declarations, I have answered all  
24 the court’s questions which are far beyond petty and completely non substantive.

25                   5. The outstanding arrest warrant is for the alleged violations which have now been purged  
26 with the answers in the 9th declaration.

1 6. To keep a pending arrest warrant for previous purged contempt charges as a condition of a  
2 new Court order is a violation of my due process under the 5th Amendment of the Constitution.  
3 Debtor cannot be in violation of a Court order with a stale accompanying arrest warrant that has  
4 already been purged.

5 7. I have attached the latest Court order and my declaration which gives a clear picture of  
6 Sheri Bluebond's appetite for Debtor jail time.

7 8. Today, I received a lifting of the Body Detention warrant in one order and then the threat  
8 of another Body Detention if I did not do the following:

9 a. Allow Trustee to inspect my residence by 9/30/22

10 b. Force a tenant who has a lease on an abandoned property to give up 14 pieces of  
11 furniture which the Trustee inspected 7 months ago with a threat of another arrest warrant..  
12

13 The house was leased furnished with some nice antiques in a modern environment.

14 i. He won't give it up and stands by his lease.

15 ii. I cannot comply with this order.

16 iii. Judge Bluebond will find me in contempt of her order without a  
17 hearing. A violation of my due process.  
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19 **RULINGS:**

20 1. She ruled against distributing the \$1.3M proceeds of an escrow of an entity that was a party  
21 to the entity because she said that selling real estate was not in the normal course of business.

22 This is ridiculous because that's what the entity does is buy/sell real estate through 1031  
23 exchanges. It makes outright sales when tax appropriate and there is a need for capital.

24 2. 12/21/21 She ruled that the entities were the alter ego of Mark Slotkin by doing the  
25 following:  
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- a. She took a sitting Superior Court’s ruling from Judge Diana Gould Saltman that the entities were not the Alter ego of Mark Slotkin and used the exact language from that court but deleted the words *While* at the beginning of the sentence and deleted the words *are not the Alter ego of Mark Slotkin* at the end of the Judge Saltman’s ruling. In effect, she used the judge’s language but completely changed the meaning of the ruling.
  - b. She disregarded Judge Rolf Treu ruling differentiating Mark Slotkin from Antiquarian Traders and Olympic Holdings.
  - c. She awarded an MSJ to the Trustee when there were many disputed facts. She muted me when I wanted to speak.
  - d. She ignored two sitting judges who ruled the same thing and thus violated collateral estoppel and res judicata precedents.
- 3. She refused to stay her MSJ ruling knowing it would bring irreparable harm to Debtor.
  - 4. She refused to let me speak, except for a few short words, on a motion to give \$415,000 from the estate back to properties that the Trustee abandoned. She denied the motion without hearing the pertinent part of the oral arguments.
  - 5. She pulls rulings out of the hat that the Trustee’s attorney doesn’t begin to mention.